

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 9/29/2023

ork 1000-1601 | TEL (212) 849-7000 FAX (212) 849-7100

The conditions of Mr. Ortiz's release are hereby modified to permit travel to Connecticut for purposes of employment.

WRITER'S DIRECT DIAL NO.
(212) 849-7140

WRITER'S EMAIL ADDRESS
marcgreenwald@quinnmanuel.com

September 28, 2023

VIA ECF

Hon. Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square, Room 415
New York, NY 10007

Re: ***United States v. Steven Ortiz; 22 CR 84 (VSB)***

Dear Judge Broderick:

We represent Steven Ortiz, and write to update the Court with respect to Mr. Ortiz's new employment, and to respectfully request that Mr. Ortiz's conditions of release be modified to include travel to Connecticut for the purpose of said employment.

Mr. Ortiz was recently hired by Transportation Corporation of Westchester ("TLC") as a school bus monitor. TLC is a school bus operator running routes through New York (servicing Brooklyn, Queens, the Bronx, Yonkers, and Westchester), Connecticut (servicing Stamford and Fairfield), and New Jersey. We understand TLC may assign Mr. Ortiz to any route on any given day, without advance warning.

Currently, Mr. Ortiz's conditions of release restrict his travel to the Southern District of New York, the Eastern District of New York, and the District of New Jersey.

We have spoken to both Mr. Ortiz's pretrial services officer, Leo Barrios, and AUSAs Patrick Moroney and Brandon Harper, none of whom object to the modification of Mr. Ortiz's conditions of release to include travel to Connecticut for the purposes of employment.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ *Marc L. Greenwald*

Marc. L. Greenwald

Cc: AUSAs Patrick Maroney and Brandon Harper (via ECF)
Pretrial Services Officer Leo Barrios (via email)

quinn emanuel urquhart & sullivan, llp

ATLANTA | AUSTIN | BOSTON | BRUSSELS | CHICAGO | DOHA | HAMBURG | HONG KONG | HOUSTON | LONDON | LOS ANGELES | MANNHEIM | MIAMI | MUNICH | NEUILLY-LA DEFENSE | NEW YORK | PARIS | PERTH | RIYADH | SALT LAKE CITY | SAN FRANCISCO | SEATTLE | SHANGHAI | SILICON VALLEY | STUTTGART | SYDNEY | TOKYO | WASHINGTON, DC | ZURICH